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June 24, 2021

VIA ECF

Hon. Ann M. Donnelly
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Felipe Rodriguez v. City of New York, et al.*, 21 Civ. 1649 (AMD)(RLM)

Dear Judge Donnelly,

We represent defendants Metropolitan Transportation Authority (“MTA”), Long Island Rail Road Company (“LIRR”), and retired Detectives Thomas Sullivan and Charles Wendel in this matter (collectively, the “MTA Defendants.”). On June 11, 2021, co-defendants represented by the New York City Law Department moved to stay all discovery pending the outcome of the Defendants’ anticipated motions to dismiss the Complaint, or in the alternative, to stay all *Monell* discovery and/or that such claims be bifurcated. (Dkt. 26.) For all the reasons set forth therein, and now that this Court has granted the Defendants’ respective pre-motion conference requests, the MTA Defendants respectfully join the City Defendants’ motion in all respects.

We thank the Court for its time and attention to this matter.

Respectfully submitted,


Steven M. Silverberg

cc: **VIA ECF**
All Counsel of Record